

Appl. No. 09/713,615

Response to Office Action of January 5, 2006

**REMARKS**

This Response is submitted in reply to the Office Action dated January 5, 2006, issued in connection with the above-identified application. Presently, claims 1, 3, 8-9, 11-12, 14, 18-23, 25-30 and 33-39 are pending in the patent application. Claims 2, 4-7, 10, 13, 15-17, 24, and 31-32 were canceled without prejudice. With this Response, claims 1, 3, 23 and 38-39 have been amended. No new matter has been introduced by any amendments made to the claims. Thus, entry and favorable reconsideration are respectfully requested.

**I. Response To Claim Rejections**

Claims 1, 3, 8-9, 11-12, 14, 18-21, 23, 25-30, 33-34 and 36-39 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Emens et al. (U.S. Patent No. 6,463,343, hereafter "Emens") and further in view of Slocum et al. (U.S. Patent No. 6,430,306, hereafter "Slocum"). Claims 1, 3 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Emens in view of Bansal (U.S. Patent Application No. 2002/0000468, hereafter "Bansal"). The Applicants traverse the above rejections for the following reasons.

To expedite prosecution, the Applicants have herein amended independent claims 1, 3, 23 and 38-39 to further distinguish the present invention over the cited prior art. Specifically, the above claims have been amended to more particularly point out that the identification step and means of the present invention identify targets on the basis of the identification information imaged, *wherein the identification information is attached to the captured images of the targets*. Additionally, the connection step or means of the present invention has been amended to point out that *a connection path is automatically identified* and established between the user terminal and the targets identified *based on the identification information*. These features of the present invention are fully supported by the Applicants' disclosure and are not believed to be disclosed, taught or suggested by the cited prior art. (See, Applicants' application, Figs. 6 & 12 and pages 37 & 44).

Emens discloses a method for controlling a remote device using a digital image of a remote location. However, Emens describes associating regions of an image with a device manually. (See, Emens, Col. 5, Line 65-Col. 6, Line 15). Further, Emens discloses that this manual action can result in incorrectly associating image regions and devices causing system malfunctions. (See also, Emens, Col. 5, Lines 34-47). Finally, in the Office Action, the

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Examiner correctly states that "Emens does not expressly disclose an identification means for automatically identifying the targets on the basis of the identification information imaged by said imaging means, nor a step of automatically identifying the target." (See, Office Action, pgs. 4 & 8). Therefore, Emens clearly fails to disclose, at a minimum, the identification step and means, and connection step and means as recited in independent claims 1, 3, 23 and 38-39 (as amended).

Moreover, after a detailed review of Slocum and Bansal, neither reference appears to overcome the deficiencies noted above in Emens to render obvious independent claims 1, 3, 23 and 38-39.

Slocum teaches or suggests a system and method that employs facial recognition to create and maintain databases that store records of individuals. The Examiner suggests that the system and method in Slocum is able to automatically identify a person based on a facial scan and the stored records, which renders obvious the claimed identification step and means of the present invention. However, Slocum does not teach or suggest automatic recognition based on identification information attached to the captured images of targets. Additionally, nowhere does Slocum teach or suggest an automatic identification of a connection path followed by a connection to a target based on the identification information. Instead, Slocum is only directed to identifying imaged targets (i.e., individuals) based on stored records. There is no teachings directed to follow-up actions such as connecting to the imaged target.

Bansal teaches or suggests a system and method for scanning and storing universal resource locator codes (URLs). As seen in Fig. 1, the identification information (i.e., barcode) is scanned. The identification information is representative of URLs, which are stored in a memory. The URLs can later be recalled and transmitted by a user to an Internet access device. The Internet access device uses the URLs to retrieve information from, for example, a web page. However, Bansal also falls short of the present invention for several reasons. First, the identification information is not attached to a captured image of the target. In Bansal, the barcode is the target. Second, there is no automatic identification of the connection path followed by a connection to the target based on the identification information. In Bansal, the URLs are simply stored in a memory, therefore, the user is still required to manually select a URL to transmit to an Internet access device for establishing a connection. Third, the connection (albeit manual) is to a URL or web page, not to the imaged target (i.e., barcode).

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Therefore, even if it were proper for one of ordinary skill in the art to combine the teachings of Emens, Slocum and Bansal, the combination still would not teach or suggest all the features recited in claims 1, 3, 23 and 38-39 (as amended). In particular, an identification step or means that identifies targets on the basis of the identification information imaged, wherein the identification information is attached to the captured images of the targets. Additionally, a connection step or means that automatically identifies a connection path and establishes a connection between the user terminal and the targets based on the identification information.

For at least these reasons, claims 1, 3, 23 and 38-39 are believed to be distinguished over Emens, Slocum and Bansal, individually or in combination. Likewise, dependent claims 8-9, 11-12, 14, 18, 19-22 and 25-37 are also believed to be distinguishable over Emens, Slocum and Bansal, individually or in combination, based on their respective dependencies on claims 3 and 23.

## **II. Conclusion**

In light of the above, the Applicants respectfully submit that claims 1, 3, 8-9, 11-12, 14, 18-23, 25-30 and 33-39 are patentable over the prior art of record. Accordingly, the Applicants respectfully request that a timely Notice of Allowance be issued in this case. If any additional fees are due in connection with this application as a whole, the Commissioner is authorized to deduct such fees from deposit account no. 02-1818.

Respectfully submitted,

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